

Alternative B – Blue Mountain Biodiversity Project

During the course of initial scoping and public involvement for this project the BLM received a thorough description of one treatment alternative for Little Canyon Mountain from the Blue Mountain Biodiversity Project (BMBP). After review of this description the IDT decided to accept it as an alternative and analyze it accordingly. This decision was reached since the detail used in the description could be directly applied to the ground and impacts assessed. In the following description of this alternative the original proposal is presented first followed by any clarifications as described by the IDT in bold. For the purposes of this alternative the wildland-urban interface boundary was defined as “...urban interface area (between 50 to 1000 feet depending upon terrain, prevailing wind directions, and vegetation types)” (LOWD 2002).

In this alternative a fuel break would be created up to but not exceeding 1000 feet inside the project boundary. The boundary is defined as the wildland-urban interface boundary between BLM and private lands, primarily covering the west and north sides of the LCM project area. For the purpose of analysis the maximum 1000-foot area was considered. Within this proposed fuel break, the following guidelines will be implemented under this alternative:

“Minimum Mandatory Guidelines For All Projects Purporting To Be Restoration, Forest Health, and/or Recovery Projects Within Interior Pacific Northwest Forests

- I. All proposed projects, which purport to fall within the categories of restoration, forest health, and/or recovery, must be motivated by ecological need. Restoring wildlife, fisheries, botanical, and soils habitat, ecological integrity and watershed functioning must be the integral interwoven driving goals of proposed projects. As commercial logging has been both the direct and indirect cause of forest and aquatic ecosystem degradation, it cannot be a major objective of these projects. Any commercial logging included within a proposed project must be secondary in consideration, and subservient to needed restoration objectives. Commercial logging's potential (if any) exists only in so far as it results from the implementation of needed methods to meet the project's goals. Funding for any project proposed within restoration or forest health categories cannot be tied to commercial logging. The financial means to accomplish the project and its goals must be firmly established, independent of any secondarily proposed commercial logging. Commercial logging utilized in restoration/forest health/recovery projects must fully meet all of the following conditions:
 - A. No logging of trees greater than 12 inches diameter breast height (dbh).
 - B. No logging on steep slopes above 30 percent.
 - C. No logging on slopes greater than 20 percent, which are geologically unstable, prone to erosion, slumping, and/or slides. **After review there were no areas identified on Little Canyon Mountain within the 1000-foot designated fuel break that were geologically unstable.**

- D. No logging within riparian areas; including rivers, streams, creeks, seasonal and ephemeral drainages, runoff draws, seep and spring areas, ponds, lakes, bogs, swamps, and seasonal bogs. No logging within established buffers for any of the above. PACFISH and INFISH buffers must be doubled when the slope angle exceeds 15 degrees and/or when the soils are geologically unstable and prone to erosion, slumping, or landslides. **The IDT converted slope degrees to slope percentage; which converts to 25 percent. Due to the topography of Little Canyon Mountain very few areas adjacent to streams have slope below this criteria therefore PACFISH buffers, where applicable, were doubled across the project area.**
- E. Heavy machinery and/or logging methods which result in further compaction of area soils cannot be used.
- F. Subsoiling is not a viable "mitigation" for compaction due to its destructive impacts upon the forests' soil fungal, microbial, and vegetative communities. Subsoiling may only be utilized in restoration of areas previously compacted-such as closed road beds, log landing decks, skid trails, closed mine sites, areas of heavy livestock compaction or recreational over-use. Subsoiling cannot be used when it will result in further soil erosion and sedimentation to area aquatic systems.
- G. Canopy closure of 60% in mixed conifer stands, and 45% in ponderosa pine stands must be retained. If canopy closure is below these percentages no commercial logging can occur at all. **Mixed stands were defined by the IDT as conifer/non-juniper.**
- H. No extirpations of any old growth dependent and/or forest canopy dependent species can occur within the project area, including within any of its individual "units".
- I. Site-specific surveys for all species which currently utilize project and adjacent areas must be conducted as part of proposed projects' development and planning.
- J. All habitat requirements and components must be retained for all old growth and forest canopy dependent species, including: goshawks, pileated woodpeckers, black-backed and northern three-toed woodpeckers, white-headed woodpeckers, pygmy and flammulated owls, pine marten, fisher, wolverine, lynx, wolf, black bear. Townsend's big-eared bat, neo-tropical migrant and native birds, etc.
- K. Watershed quality must be maintained and improved by the project.
- L. Habitat conditions for all fish, ESA listed aquatic species, and species of concern, must be maintained and improved by the project. No "take"/mortality of any individual members of listed species can be permitted. No extirpations of any of these species can occur.
- M. Livestock grazing issues, concerns, and degradation must be addressed, and conditions must be improved, including implementing as needed effective livestock exclosures, reductions in the numbers of livestock, removal of livestock, and/or resting or terminating grazing

allotments. Livestock grazing cannot be "outside the scope of the project".

- N. The cumulative impacts of all management/extraction activities on project area and adjacent public and private lands must be addressed and disclosed in the project's analysis and planning. Wildlife, fisheries, and ecosystems do not recognize artificial human societal boundaries. Projects must be modified to address cumulative area impacts. The cooperation of adjacent area private landowners must be sought in working to achieve restoration objectives.
- O. Absolutely no new road construction, including no "temporary" roads and no re-opening, or temporary use of, any closed roads.
- P. No commercial logging within roadless areas larger than 400 acres. No tree felled "fuel breaks", helicopter landing pads, or industrial incursions that would change the natural historic character of any roadless areas. **Since the BLM does not have designated roadless areas the term roadless was taken by the IDT to mean non-roaded for the purpose of this project. In the analysis, trails and OHV routes were not considered as 'roads'.**
- Q. The extent of prescribed fires must stay within the area's historical natural range of variability for fire intervals and number of acres burned. Spring burning should not occur in areas in which it was historically uncommon. Aerial ignition of prescribed fires must not be utilized to avoid detrimental impacts to wildlife dens, nests, middens, burrows, rare and sensitive plants, and needed habitat components. Unnatural "fuel breaks" cannot be created. **Unnatural 'fuel breaks' would seem to preclude any type of human caused fuels treatment involving the removal of trees and ladder fuels for the purpose of managing fire 'habitat'. Since the 'natural' processes to remove or limit fuel and create fuel breaks are topography, geology, time (decomposition) and fire; treatments that involve other means would seem to be prohibited. This interpretation would revert to the No Management Action Alternative as described previously. Since this interpretation would render all other design criteria described in this alternative moot the IDT decided to retain human caused treatments within this alternative.**
- R. Wildlife corridors with sufficient hiding cover, including necessary natural thickets, must be retained. New OHV/ORV trails cannot be part of the project.
- S. The project cannot result in the further spread of exotic invasive plants. Chemicals and/or herbicides cannot be utilized by the project.
- T. Chemicals, pesticides, or biocides cannot be utilized to kill, control, or manipulate any native insect species populations, including periodic "outbreak" cycles (which are a natural component of forest ecosystems).
- U. No misapplication of blanket ecosystem theories, eg: "ponderosa pine park-like stands", "fir encroachment", etc. to historic mixed conifer

stands or dense mid to high elevation multi-storied p.pine stands, etc. Proposed project planning must be site specific, accurate, and ground-truthed as to the actual historical natural composition and density of area forest stands. Planning must also address the cumulative impacts to the area's adjacent forest habitat, and the current wildlife dependence and utilization of the project area. Planning must be modified accordingly to protect wildlife needs and long-term area recovery.

- V. Non-commercial methods to accomplish project goals must be presented as viable alternatives, and their impacts accurately assessed as compared to any proposed commercial methods. **Particular methods of forest treatment are not divided into commercial versus non-commercial categories.**
- W. Proposed projects must fully comply with all environmental policy laws of this nation. The NEPA process must be utilized with full appeal and litigation rights. Negotiations resulting in the separation of portions of projects; which have environmental, public, and scientific consensus may be utilized to allow necessary timely projects to proceed. An automatic stay upon all controversial portions of projects pending final outcome of judicial review, including appeal, must be granted as part of project guidelines.
- X. Projects must address how to restore unregenerated and under-regenerated old logging areas, and other detrimental impacts from past management activities: skid trails, slash piles, high road densities, sources of continuing sedimentation, excessive high watershed temperatures, etc. Projects must focus on finding solutions to these serious issues before proposing any more commercial logging-of any type-within area forests.
- Y. This is intentionally left open to:
 - a. Allow for additional watershed site specific and/or proposed project specific information to be included; and
 - b. To acknowledge that needed restoration is an evolving process of understanding and awareness, which must remain open to facilitate incorporation of areas and issues which may need to be included within these guidelines.
- II. Proposed projects must meet all of the above guidelines, including non-commercial restoration projects. All proposed projects must include both non-commercial methods for accomplishing their goals, as well as viable funding sources for their accomplishment. Agencies are encouraged to work with native nations, citizen environmental advocacy organizations, and area private landowners in developing comprehensive and potentially successful ecosystem restoration projects.
- III. Monitoring and Compliance: All projects must be accurately and honestly monitored for compliance with all of the above guidelines, both by responsible agency personnel (who must be adequately funded, equipped, and spend sufficient time in the project site) -and by independent groups.

Projects must be halted when the above guidelines are not being met, or whenever it becomes apparent that the project's restoration goals cannot be achieved by the methods then utilized.

Restoration and forest health are relatively new fields, on the current scale and focus, for many public agencies and their personnel. Commercial companies and contractors, not limited to logging personnel, are even more recent (and historically reluctant) to embrace these concepts in word or deed. The management track record in the forest yet remains dismally close to the old destructive "business as usual", especially with respect to logging, grazing, mining, and roading projects. It must be acknowledged that the transition towards ecologically responsible projects being successfully initiated and completed will take time and consistent effort. Indeed, the very ability and credibility of public lands agencies' projects are beyond being "in question", they need to be redeemed. This can only be accomplished with honesty, diligence, adequate funding, and a sincere effort at strict compliance with all necessary guidelines, credible science, environmental policy laws, and the ecological needs of the forests, wildlife, and fisheries. Monitoring and compliance, to be effective, needs to have serious enforceable legal consequences. Repeat violators of project guidelines must not only be stopped, they must also be prohibited from further commercial activities on public lands and be required to provide recompense for the damage they incur. Such provisions need to be included within project proposals.

These guidelines are based upon the accompanying scientific research and information, as well as years of biodiversity project survey, observation, and experience. The guidelines were initially published as a draft for public, agency, and conservation community review in October, 2000, and compiled after comments in June, 2002.”

The scientific research referred to is included in its draft form in Appendix B (LOWD 2000).

The effective management area is located primarily in sections 6 and 7 and totals 225 acres after restrictions on slope, PACFISH buffers and non-roaded areas are applied. These 225 acres would be treated as a strict small tree thinning targeting trees less than 12 inches in diameter. Slash would be piled and burned onsite. This alternative would not treat sections 1 or 12 where forest conditions are more threatening to the local urban areas due to their proximity to the denser populations within the city limits of Canyon City, due to the restrictions for slope and non-roaded areas.